

## REMARKS

### I. Summary of the Examiner's Action

#### A. Claim Rejections

In paragraph 3 of the Office Action dated February 4, 2005, the Examiner rejected claims 1 – 7, 9 – 19 and 21 – 23 under 35 U.S.C. § 103(a) as being unpatentable over United States Patent No. 6,507,857 to Yalcinalp (hereinafter “the Yalcinalp patent”) in view of United States Patent No. 6,589,291 to Boag *et al.* (hereinafter “the Boag patent”).

In paragraph 15 of the Office Action, the Examiner rejected claims 8 and 20 under 35 U.S.C. § 103(a) as being unpatentable over the the Yalcinalp and Boag patents as applied to claims 1 – 7, 9 – 19 and 21 – 23, and further in view of United States Patent No. 6,616,700 to Thum *et al.* (hereinafter “the Thum patent”).

### II. Applicant's Response – Claim Rejections

#### A. Rejection of Claims 1 – 7, 9 – 19 and 21 – 23 under 35 U.S.C. § 103(a)

Applicant seeks to refocus the Examiner's attention on claim 13. Claim 13 recites the following subject matter:

13. A server in a client-server communication system, the server comprising:  
a content transformation operating program to perform operations that comprise:  
receiving a content request from a client;

performing a first stage content transformation to generate a first stage data layout based upon said content request;  
performing an intermediate stage content transformation using said first stage data layout to generate an intermediate data layout; and  
performing a final stage content transformation using said intermediate data layout to generate a presentation format based on a device used by said client.

Notably, Applicant observes that the content transformation steps recited in claim 13 are performed by the server. It is not seen where the references of record either describe or suggest the performance of first stage, intermediate stage, and final stage content transformation steps at a server which has received a content request from a client.

First, the Examiner has reiterated in the most recent Office Action that “Yalcinalp does not explicitly disclose performing an intermediate state content transforming using said first stage data layout to generate a intermediate data layout.” (February 4, 2005 Office Action, page 3, lines 8 – 10) Second, and in particular, the Boag reference does not concern methods and apparatus for performing content transformation steps, including an intermediate stage content transformation, solely at a server in a client-server system. Rather, the Boag reference concerns a method and system that chooses the appropriate location to apply style sheets depending on the capability of client and server devices:

To achieve the foregoing objects, and in accordance with the purpose of the invention as broadly described herein, the present invention provides a method, system, and computer-readable code for use in a

computing environment capable of having a connection to a network, for dynamically determining the most appropriate location to apply style sheets. The technique comprises: selecting one or more style sheets to transform a particular input document; determining whether a client device is capable of applying the selected style sheets; applying the selected style sheets at the client device when the determining has a positive result; and applying the selected style sheets at a server when the determining has a negative result. The determining may determine a first subset of the selected style sheets that the client device is capable of applying, and a second subset that the client device is not capable of applying. In that case, the applying at the client step applies the first subset, and the applying at the server step applies the to [sic] second subset.

In one aspect, when the determining has a positive result, the technique may further comprise: caching the selected style sheets at the server; modifying the input document to refer to the cached style sheets; and sending the modified input document to the client. When the determining has a negative result, the technique may further comprise: sending the input document to the client following completion of the applying at the server. [Boag patent, Column 4, lines 23 – 49] (emphasis added)

Applicant respectfully observes that his invention does not operate in this manner; the content transformation steps are performed at the server.

For example, the operation of Applicant's invention is described here:

In an exemplary implementation of the client-server communication system 100 the client 101 is typically connected to the server 108 via client-server link 102. The client-server link 102 may

comprise a wireless link or an electronic link, such as a telephone connection. The client 101 comprises a software program, such as a browser, to allow the user to create and send a content request 104. The client 101 may be a mobile terminal, general purpose computer, a Personal Digital Assistant (PDA) or other client terminal device having the browser. The server 108 may be a general-purpose computer having a memory and processor. The server 108 may be connected to one or more clients analogous to client 101. The server 108 comprises plurality of operating programs which receive user's search request, such as the content request 104. The server 108 further comprises multi-stage content transformation operating program 109 for carrying out an embodiment of the invention. The server 108 is typically connected to the database 112 via a server-database link 110 for retrieving data based on the content request 104 wherein the server-database link 110 may be a wireless or an electronic link. [Application, Page 3, line 19 – page 4, line 4]

\* \* \*

FIG. 2 illustrates a preferred embodiment of a multi-stage content transformation process 200. The content is transformed in three stages, a first stage content transformation 222, an intermediate stage content transformation 224 and a final stage content transformation 226. Each stage comprises one or more stage rules (also known as formatting template or stylesheet) defining the layout of a Meta Markup Language (MML) document wherein data is embedded according to rules. In the preferred embodiment, a generic Extensive Stylesheet Language Transformation (XSLT) engine is used to merge (transform) data according to the rules in each stage. [Application, Page 4, lines 24 -32]

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The intermediate stage 224 comprises one or more sub-stages that are executed using one or more intermediate rules to further transform first stage data layout 208 to intermediate stage data layout 214 . . . When all

the rules are merged (or all the sub-stages are executed), the intermediate stage data layout is created. In the preferred embodiment the intermediate stage comprises a browser-type sub-stage using a set of browser-type rules, an internationalization stage using a set of internationalization rules, a user profile stage using a set of user profile rules, and a optimization stage using optimization rules. [Application, Page 5, lines 20 – 21]

It is not seen where the Boag reference, or any of the other references, either describe or suggest a content transformation process performed at a server having an intermediate content transformation stage operating in the manner of Applicant's invention. If the Examiner disagrees, Applicant respectfully requests that the Examiner identify with particularity exactly where such subject matter is disclosed.

In addition, when performing a complex set of transformations, the Boag reference teaches away from performing a distinct intermediate stage content transformation as in the case of Applicant's invention:

(When a sequence of style sheets is to be applied to perform a complex transformation, the technique disclosed in the first related invention will preferably be used to chain the multiple style sheets together. The modified reference in the input document is then a reference to where the chained style sheets are cached.) [Boag patent, Column 11, lines 11 – 16]

Notably, neither in this portion, nor in any other portion of the Boag patent, is there a description or suggestion of performing at a server an intermediate stage content transformation followed by a final stage content transformation.

For the foregoing reasons, Applicant respectfully submits that claim 13, and claim 1 which recites similar subject matter, is patentable over the art of record. As a result, Applicant respectfully requests that the Examiner withdraw the rejection of these claims. In addition, Applicant respectfully submits that dependent claims 2 – 7, 9 – 12, 14 – 19 and 21 – 23 are patentable as depending from independent claims that are patentable for the foregoing reasons. Accordingly, Applicant respectfully requests that the rejection of dependent claims 2 – 7, 9 – 12, 14 – 19 and 21 – 23 be withdrawn as well.

Regarding claims 5 and 17, Applicant submits the following additional arguments supporting the patentability of these claims. In particular, since the references of record neither describe nor suggest performing an intermediate stage content transformation between first and final stage content transformations at a server in a client-server communication system, neither do they describe nor suggest an intermediate stage content transformation comprised of at least one sub-stage as in the case of claims 5 and 17. For these additional reasons claims 5 and 17 are patentable over the art of record.

Regarding claims 6 – 9 and 18 – 21, since the references of record neither describe nor suggest an intermediate stage content transformation comprised of at least one substage, neither do they describe nor suggest particular sub-stages as in the case of claims 6 – 9 and 18 – 21. For these additional reasons claims 6 – 9 and 18 – 21 are likewise patentable.

Commissioner for Patents  
Application Serial No. 09/691,775  
April 27, 2005  
Page 14

B. Rejection of Claims 8 and 20 under 35 U.S.C. § 103(a)

Applicant respectfully submits that claims 8 and 20 are patentable as depending from independent claims which Applicant submits are patentable for the foregoing reasons. In addition, claims 8 and 20 are patentable for reasons similar to claims 6 – 9 and 18 – 21 – since none of the references either describe or suggest an intermediate stage content transformation comprised of at least one sub-stage, neither do they describe nor suggest a particular sub-stage as in case of claims 8 and 20.

Commissioner for Patents  
Application Serial No. 09/691,775  
April 27, 2005  
Page 15

III. Conclusion

The Applicant submits that in light of the foregoing remarks the application is now in condition for allowance. Applicant therefore respectfully requests that the outstanding rejections be withdrawn and that the case be passed to issuance.

Respectfully submitted,

April 27, 2005

Date

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